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April 10, 2024

**Via ECF**

Hon. Lewis J. Liman, U.S.D.J.  
United States District Court for the Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

**Re: *Grifols, S.A., et al. v. Yu, et al.***  
**No. 1:24-cv-00576-LJL**

Dear Judge Liman,

This firm represents Plaintiffs Grifols, S.A. and Grifols Shared Services North America, Inc. (collectively, “**Grifols**”). Pursuant to section 1(C-D) of Your Honor’s Individual Practices in Civil Cases, Grifols writes, together with Defendants Daniel Yu, Gotham City Research, LLC, General Industrial Partners, LLP, and Cyrus De Weck (collectively, “**Defendants**”), to respectfully request entry of the attached Stipulation and Proposed Order.

The Stipulation and Proposed Order deems Grifols’ Complaint (ECF No. 1) and Summonses served on Defendants as of April 5, 2024. The Stipulation and Proposed Order further sets forth a proposed briefing schedule on any responsive motion filed by Defendants in lieu of answering Grifols’ Complaint. No previous extensions of any applicable deadlines have been sought given, at this stage of the litigation, no previous deadlines have been set.

If acceptable to Your Honor, the parties respectfully request the Court “So Order” the Stipulation and Proposed Order and have it entered on the Court’s docket.

We thank the Court for its time and consideration and remain available should Your Honor or any member of Your Honor’s staff have questions.

Respectfully,

/s/*Peter D. Doyle*

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